

EXHIBIT 4



Linnea Pedelty <linnea@nickwooten.com>

Maxwell vs . Wells Fargo - Request for Confirmation

Parker, Chris <CParker@winston.com>

Thu, Oct 28, 2021 at 5:31 PM

To: Nick Wooten <nick@nickwooten.com>, "Smedley, Angela A." <ASmedley@winston.com>, "Obi, Shawn" <SObi@winston.com>, "Glauber, Scott" <SGlauber@winston.com>, Rusty Payton <info@payton.legal>, "Salvador J. Lopez" <lopez@robsonlopez.com>, Sandy Flores <sflores@robsonlopez.com>, Linnea Pedelty <linnea@nickwooten.com>

Nick,

At this time, Wells Fargo intends to produce, on a rolling basis, documents in support of its defenses (responsive to RFP Nos. 61, 62, 73, 78, 79, 82-97). However, Wells Fargo's production is complete as to the rest of Plaintiff's RFPs. Wells Fargo does not anticipate further supplementation of its discovery responses.

Best,

Chris

Christopher M. Parker

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From: Nick Wooten <nick@nickwooten.com>

Sent: Wednesday, October 27, 2021 8:58 AM

To: Smedley, Angela A. <ASmedley@winston.com>; Obi, Shawn <SObi@winston.com>; Parker, Chris <CParker@winston.com>; Glauber, Scott <SGlauber@winston.com>; Rusty Payton <info@payton.legal>; Salvador J. Lopez <lopez@robsonlopez.com>; Sandy Flores <sflores@robsonlopez.com>; Linnea Pedelty <linnea@nickwooten.com>

Subject: Maxwell vs . Wells Fargo - Request for Confirmation

Angela, Shawn, and Chris,

I am writing to determine if Wells Fargo has any further supplementation to any of its discovery responses or any further document production prior to the filing of our motion to compel.

Can you please confirm that Wells Fargo's responses are complete in the absence of an order compelling further responses by the Court?

Thanks,

Nick

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